

FILED

JAN 27 2022 SVA

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

)
) No.

v.
)

MATTHEW JAMAAL JOHNSON

) Violation: Title 18, United States
Code, Section 922(a)(6)

)
) UNDER SEAL

22-cr-53

COUNT ONE

Judge Sara L. Ellis

Magistrate Judge Jeffrey T. Gilbert

The SPECIAL JULY 2021 GRAND JURY charges:

On or about April 23, 2020, at Oak Forest, in the Northern District of Illinois,
Eastern Division,

MATTHEW JAMAAL JOHNSON,

defendant herein, in connection with the acquisition of a firearm, namely, a Ruger EC9S 9mm pistol, bearing serial number 457-41939, from Eagle Sports Range, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, knowingly made a false and fictitious statement to the licensed dealer, which statement was intended and likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Title 18, United States Code, Chapter 44, in that the defendant represented on Form 4473 that he was the actual buyer of the firearm, when in fact, as the defendant then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about June 20, 2020, at Mokena, in the Northern District of Illinois, Eastern Division,

MATTHEW JAMAAL JOHNSON,

defendant herein, in connection with the acquisition of a firearm, namely one or more of the following: a Taurus G2C 40 caliber pistol, bearing serial number ABC440321, and a Taurus G2S 9mm pistol, bearing serial number ABD462940, from Shoot Point Blank, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, knowingly made a false and fictitious statement to the licensed dealer, which statement was intended and likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Title 18, United States Code, Chapter 44, in that the defendant represented on Form 4473 that he was the buyer of the firearm, when in fact, as the defendant then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT THREE

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about December 11, 2020, at Oak Forest, in the Northern District of Illinois, Eastern Division,

MATTHEW JAMAAL JOHNSON,

defendant herein, in connection with the acquisition of a firearm, namely one or more of the following: a Glock G35 40 caliber pistol, bearing serial number VTS737 and a HS Produkt Springfield XD-40 40 caliber pistol, bearing serial number BY465554, from Eagle Sports Range, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, knowingly made a false and fictitious statement to the licensed dealer, which statement was intended and likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Title 18, United States Code, Chapter 44, in that the defendant represented on Form 4473 that he was the buyer of the firearm, when in fact, as the defendant then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FOUR

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about December 18, 2020, at Oak Forest, in the Northern District of Illinois, Eastern Division,

MATTHEW JAMAAL JOHNSON,

defendant herein, in connection with the acquisition of a firearm, namely a Beretta APX 9mm pistol bearing serial number A097033X, from Eagle Sports Range, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, knowingly made a false and fictitious statement to the licensed dealer, which statement was intended and likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Title 18, United States Code, Chapter 44, in that the defendant represented on Form 4473 that he was the buyer of the firearm, when in fact, as the defendant then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FIVE

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about December 30, 2020, at Hodgkins, in the Northern District of Illinois, Eastern Division,

MATTHEW JAMAAL JOHNSON,

defendant herein, in connection with the acquisition of a firearm, namely one or more of the following: a Taurus G2S 40 caliber pistol bearing serial number AMB229363, a Taurus G3C 9mm pistol bearing serial number ABM282900, and a Taurus G3C 9mm pistol bearing serial number ABM293611, from Shoot Point Blank, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, knowingly made a false and fictitious statement to the licensed dealer, which statement was intended and likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Title 18, United States Code, Chapter 44, in that the defendant represented on Form 4473 that he was the buyer of the firearm, when in fact, as the defendant then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SIX

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about January 7, 2021, at Mokena, in the Northern District of Illinois, Eastern Division,

MATTHEW JAMAAL JOHNSON,

defendant herein, in connection with the acquisition of a firearm, namely one or more of the following: a Sarsilmaz B6C 9x19 pistol, bearing serial number T1102-20G52271; a Sarsilmaz B6C 9x19 pistol, bearing serial number T1102-20G52354; a Taurus G3C 9mm pistol, bearing serial number ABM280439; a Taurus G3C 9mm pistol, bearing serial number ABN335193; a Taurus G3C 9mm pistol, bearing serial number ABN335634; and a Taurus G3C 9mm pistol, bearing serial number ABN335510, from Shoot Point Blank, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, knowingly made a false and fictitious statement to the licensed dealer, which statement was intended and likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Title 18, United States Code, Chapter 44, in that the defendant represented on Form 4473 that he was the buyer of the firearm, when in fact, as the defendant then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SEVEN

The SPECIAL JULY 2021 GRAND JURY further charges:

(On or about January 20, 2021, at Hodgkins, in the Northern District of Illinois, Eastern Division,

MATTHEW JAMAAL JOHNSON,

defendant herein, in connection with the acquisition of a firearm, namely one or more of the following: a SCCY CPX-2 9mm pistol, bearing serial number C040868; a SCCY CPX-2 9mm pistol, bearing serial number C036963; and a Kahr Arms CW9 9mm pistol, bearing serial number G017565, from Shoot Point Blank, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, knowingly made a false and fictitious statement to the licensed dealer, which statement was intended and likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Title 18, United States Code, Chapter 44, in that the defendant represented on Form 4473 that he was the buyer of the firearm, when in fact, as the defendant then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT EIGHT

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about January 22, 2021, at Mokena, in the Northern District of Illinois, Eastern Division,

MATTHEW JAMAAL JOHNSON,

defendant herein, in connection with the acquisition of a firearm, namely one or more of the following: a Tisas-Trabzon M1911 45 caliber pistol, bearing serial number T0620-20723029, and a Sarsilmaz B6C 9mm pistol, bearing serial number T1102-20G52355, from Shoot Point Blank, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, knowingly made a false and fictitious statement to the licensed dealer, which statement was intended and likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Title 18, United States Code, Chapter 44, in that the defendant represented on Form 4473 that he was the buyer of the firearm, when in fact, as the defendant then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT NINE

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about March 4, 2021, at Hodgkins, in the Northern District of Illinois, Eastern Division,

MATTHEW JAMAAL JOHNSON,

defendant herein, in connection with the acquisition of a firearm, namely one or more of the following: a Taurus G3 9mm pistol, bearing serial number ACA477548, and a Taurus G3 9mm pistol, bearing serial number ACA480800, from Shoot Point Blank, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, knowingly made a false and fictitious statement to the licensed dealer, which statement was intended and likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Title 18, United States Code, Chapter 44, in that the defendant represented on Form 4473 that he was the buyer of the firearm, when in fact, as the defendant then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TEN

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about March 16, 2021, at Mokena, in the Northern District of Illinois, Eastern Division,

MATTHEW JAMAAL JOHNSON,

defendant herein, in connection with the acquisition of a firearm, namely one or more of the following: a SCCY Industries CPX-1 9mm pistol, bearing serial number C114741, and a Glock 44 22 caliber pistol, bearing serial number AEZC041, from Shoot Point Blank, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, knowingly made a false and fictitious statement to the licensed dealer, which statement was intended and likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Title 18, United States Code, Chapter 44, in that the defendant represented on Form 4473 that he was the buyer of the firearm, when in fact, as the defendant then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT ELEVEN

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about March 29, 2021, at Lansing, in the Northern District of Illinois, Eastern Division,

MATTHEW JAMAAL JOHNSON,

defendant herein, in connection with the acquisition of a firearm, namely a Glock 19x 9mm pistol, bearing serial number AFBG973, from Pelcher's Shooters Supply, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, knowingly made a false and fictitious statement to the licensed dealer, which statement was intended and likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Title 18, United States Code, Chapter 44, in that the defendant represented on Form 4473 that he was the buyer of the firearm, when in fact, as the defendant then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWELVE

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about April 6, 2021, at Oak Forest, in the Northern District of Illinois, Eastern Division,

MATTHEW JAMAAL JOHNSON,

defendant herein, in connection with the acquisition of a firearm, namely one or more of the following: a Glock G43X 9mm pistol, bearing serial number BTGR707, and a Taurus G3C 9mm pistol, bearing serial number ACB565528, from Eagle Sports Range, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, knowingly made a false and fictitious statement to the licensed dealer, which statement was intended and likely to deceive the licensed dealer, as to a fact material to the lawfulness of the sale of said firearm to the defendant under Title 18, United States Code, Chapter 44, in that the defendant represented on Form 4473 that he was the buyer of the firearm, when in fact, as the defendant then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A TRUE BILL:

FOREPERSON

Signed by Jason Yonan on behalf of the
UNITED STATES ATTORNEY